# MICHIGAN DEPARTMENT OF NATURAL RESOURCES

## INTEROFFICE COMMUNICATION



December 21, 1992



TO: Gene Hall, Project Manager
Site Management Unit 2
Superfund Section
Environmental Response Division

FROM: Robert Delaney, Jr., Geologist
Superfund Support Unit
Geological Services Section
Environmental Response Division

SUBJECT: Albion/Sheridan Township Landfill, Buried Drums, Calhoun County

During a site visit December 15, 1992, while inspecting landfill boring sites, I discovered a cluster of four partially buried drums and a tank. The cluster is located about 50 to 70 feet to the north east of landfill boring 2 (LB 2). They were exposed to the surface in part by the burrowing of a rabbit.

This would appear to be strong evidence of the possibility of larger clusters of buried drums at this site. EPA and WW Engineering should be informed of this finding. Additionally, this underscores the need to do a more systematic screening of this site using a magnetometer.

EPA has been reluctant to do a magnetometer survey of the entire site, as we understand it, because of the problems encountered at the Metamora landfill. There is existing evidence and a historical record which indicates that it is necessary to run a magnetometer survey to locate buried drums. A magnetometer geophysical survey to locate drums is therefore appropriate for this site. If a magnetometer survey is not run, the potential to find large masses of buried drums has been successfully avoided. Given the history of landfills and the intent of the new fast track RI, it is likely that the selected remedy will consist of monitoring, containment, land use restrictions and groundwater pump and treat.

If the selected remedy does not acknowledge the possibility of buried drums of solvent and ignores environmental effects and economic effects of large quantities of solvent filled drums, it is likely that the selected remedy will not be cost effective nor protective of human health and the environment. Buried drums releasing liquids more dense than groundwater would not be collected by a groundwater pump and treat system. The bed rock is highly fractured at this site and is in direct connection to the City of Albion water supply. Ignoring the potential that this site has to contaminate a usable aquifer, which serves a large city, would not be cost effective and definitely is not protective of human health and the environment.

Avoiding the use of a technology simply because it might find evidence of contamination is not consistent with the intent of the RI/FS process, even if it is a fast track RI. It is our obligation as a cooperating agency in the

superfund program to avail the EPA of our expertise in the characterization of this land fill site.

As a result of this recent finding, we would like to have the opportunity to discuss with EPA the need to fully characterize this site. It is our responsibility to the citizens of the City of Albion, and as a cooperator in the EPA superfund process, to avail EPA of the risk to public health and environment that will be incurred as a result of their current refusal to utilize appropriate technology to protect the Albion water supply from a serious long term threat to the aquifer system.

As a minimum, a field survey which documents drum exposure at the surface, number, and location needs to be undertaken. Again, we would like to have the opportunity to discuss this further with EPA so that they will be aware of the risks to public health and the environment, and the citizens of the City of Albion.

cc: Bill Iversen, ERD
Jim Heinzman, ERD